



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

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Mr. Val Estevam  
ARC Technologies, Inc.  
37 South Hunt Road  
Amesbury, MA 01913

**March 18, 2016**  
**RE: AMESBURY**  
Transmittal No.: X267803  
Application No.: *NE-15-015*  
Class: *BLWAQ*  
FMF No.: 572524  
**AIR QUALITY PLAN  
APPROVAL**

Dear Mr. Estevam:

The Massachusetts Department of Environmental Protection (“MassDEP”), Bureau of Air and Waste, has reviewed your Limited Plan Application (“Application”) listed above. This Application concerns the proposed construction and operation of a new blade coating line at your facility located at 37 South Hunt Road, Amesbury, Massachusetts (“Facility”). The Application was submitted on November 28, 2015. Amended Application was submitted on February 16, 2016.

This Application was submitted in accordance with 310 CMR 7.02 Plan Approval and Emission Limitations as contained in 310 CMR 7.00 “Air Pollution Control,” regulations adopted by MassDEP pursuant to the authority granted by Massachusetts General Laws, Chapter 111, Section 142 A-J, Chapter 21C, Section 4 and 6, and Chapter 21E, Section 6. MassDEP’s review of your Application has been limited to air pollution control regulation compliance and does not relieve you of the obligation to comply with any other regulatory requirements.

MassDEP has determined that the Application is administratively and technically complete and that the Application is in conformance with the Air Pollution Control regulations and current air pollution control engineering practice, and hereby grants this **Plan Approval** for said Application, as submitted, subject to the conditions listed below.

Please review the entire Plan Approval, as it stipulates the conditions with which the Facility owner / operator (“Permittee”) must comply in order for the Facility to be operated in compliance with this Plan Approval.

## **1. DESCRIPTION OF FACILITY AND APPLICATION**

ARC Technologies, Inc. (“the Permittee”) currently houses four (4) exempt spray booths. These four booths are as follows: Composites (1 spray booth); Thermoplastics (1 spray booth); and the latex based materials (2 spray booths). These spray booths comply with the applicable performance standards of 310 CMR 7.03 (16)(b) through (i), including the recordkeeping requirements of 310 CMR 7.03(16)(k); therefore these spray booths are exempt from permitting requirements. The Facility tracks the actual volatile organic compounds (VOC) and hazardous air pollutants (HAP) emissions from these four paint spray booths on a monthly basis based on material balance.

The Permittee proposes to install a new Pyradia blade coater to manufacture sheet stock (rolled goods produced from blade coater) which will be cut to size into multiple product. The coater will have a maximum line speed of 20 feet per minute. The coater will be able to accommodate a web width of up to 36 inches, will utilize a knife over roll head at temperatures ranging from 250 Fahrenheit (°F) to 350 °F and have a maximum gap of 0.03 inches.

The Permittee proposes to operate 8 hours per day, 5 days per week and 52 weeks per year. The maximum potential VOC emission rate from the new blade coater will be 4.4 tons of VOC and 0.9 tons of HAP per year. The Permittee proposes facility-wide VOC and HAP emission limits of 7.4 tons per year and 3.0 tons per year, respectively.

## **2. EMISSION UNIT (EU) IDENTIFICATION**

The Emission Units (EUs) identified in Table 1 are subject to and regulated by this Plan Approval:

<b>Table 1</b>			
<b>EU#</b>	<b>Description</b>	<b>Design Capacity</b>	<b>Pollution Control Device (PCD)</b>
EU1	Pyradia Coating Line	20 feet/minute	N/A

**Table 1 Key:**

EU = Emission Unit

# = Number

N/A = Not applicable

PCD = Pollution control device

### 3. APPLICABLE REQUIREMENTS

#### A. OPERATIONAL, PRODUCTION AND EMISSION LIMITS

The Permittee is subject to, and shall not exceed the Operational, Production, and Emission Limits as contained in Table 2, below:

<b>Table 2</b>				
<b>EU#</b>	<b>Operational / Production Limit</b>	<b>Air Contaminant</b>	<b>Emission Limit</b>	
			<b>TPM</b>	<b>TPY</b>
EU1	Limit coating operations such that VOC and total HAP emissions do not exceed the limits contained herein.	VOC	1.5	4.4
		Total HAP	0.3	0.9
Facility-wide <sup>1</sup>	The maximum VOC content of each coating shall be less than 65 percent by weight.	VOC	2.5	7.4
	The maximum vapor pressure of cleaning solvent shall be less than 1.0 mm of Hg at 20 °C.	Total HAP	1.0	3.0

**Table 2 Key:**

EU# = Emission Unit Number

VOC = Volatile Organic Compounds

HAP = Hazardous Air Pollutants

PM = Particulate Matter

N/A = Not applicable

TPM = tons per month

TPY = tons per consecutive 12-month period

**Table 2 Note:**

<sup>1</sup> = Facility-wide emissions included all emissions from permitted and exempt emission units and/or activities emitted from the Facility.

**B. COMPLIANCE DEMONSTRATION**

The Permittee is subject to, and shall comply with, the monitoring, testing, record keeping, and reporting requirements as contained in Tables 3, 4, and 5 below.

<b>Table 3</b>	
<b>EU#</b>	<b>Monitoring and Testing Requirements</b>
EU1	1. Monitor usage of VOC and HAP containing coating/cleaning chemicals at the Facility and VOC and HAP content of each coating/cleaning chemical used at the Facility on a monthly basis such that the Facility's actual emissions of VOC/HAP can be used to determine compliance status with the emission limits contained in Table 2 above.
Facility-wide	2. Monitor usage of VOC and HAP containing coating/cleaning chemicals at the Facility and VOC and HAP content of each coating/cleaning chemical used at the Facility on a monthly basis such that the Facility's actual emissions of VOC/HAP can be used to determine compliance status with the emission limits contained in Table 2 above.
	3. If and when MassDEP requires it, the Permittee shall conduct emission testing in accordance with USEPA Reference Test Methods and Regulation 310 CMR 7.13.

**Table 3 Key:**

EU# = Emission Unit Number  
VOC = Volatile Organic Compounds  
HAP = Hazardous Air Pollutants  
MassDEP = Massachusetts Department of Environmental Protection  
USEPA = United States Environmental Protection Agency  
CMR = Code of Massachusetts Regulations

Table 4	
EU#	Record Keeping Requirements
Facility-wide	1. The Permittee shall maintain adequate records on-site to demonstrate compliance status with all emission limits contained in Table 2 above. Records shall include the actual emissions of air contaminant(s) emitted for each calendar month and for each consecutive twelve month period (current month plus prior eleven months). These records shall be compiled no later than the 15 <sup>th</sup> day following each month. An electronic version of the MassDEP approved record keeping form, in Microsoft Excel format, can be downloaded at <a href="http://www.mass.gov/dep/air/approvals/aqforms.htm#report">http://www.mass.gov/dep/air/approvals/aqforms.htm#report</a> .
	2. The Permittee shall maintain records of monitoring and testing as required by Table 3.
	3. The Permittee shall maintain a copy of this Plan Approval, underlying Application and the most up-to-date SOMP for the EU1 approved herein on-site.
	4. The Permittee shall maintain a record of routine maintenance activities performed on EU1. The records shall include, at a minimum, the type or a description of the maintenance performed and the date and time the work was completed.
	5. The Permittee shall maintain a record of all malfunctions affecting air contaminant emission rates on EU1. At a minimum, the records shall include: date and time the malfunction occurred; description of the malfunction; corrective actions taken; the date and time corrective actions were initiated and completed; and the date and time emission rates returned to compliant operation.
	6. The Permittee shall maintain records required by this Plan Approval on-site for a minimum of five (5) years.
	7. The Permittee shall make records required by this Plan Approval available to MassDEP and USEPA personnel upon request.

**Table 4 Key:**

EU# = Emission Unit Number  
EUs = emission units  
SOMPs = Standard Operating and Maintenance Procedures  
MassDEP = Massachusetts Department of Environmental Protection  
USEPA = United States Environmental Protection Agency

Table 5	
EU#	Reporting Requirements
Facility-wide	1. The Permittee shall submit to MassDEP all information required by this Plan Approval over the signature of a “Responsible Official” as defined in 310 CMR 7.00 and shall include the Certification statement as provided in 310 CMR 7.01(2)(c).
	2. The Permittee shall notify the Northeast Regional Office of MassDEP, BAW Permit Chief by email at <a href="mailto:nero.air@state.ma.us">nero.air@state.ma.us</a> or fax 978-694-3499 as soon as possible, but no later than one (1) business day after discovery of any exceedance(s) of Table 2 requirement(s). A written report shall be submitted to the BAW Permit Chief within three (3) business days thereafter and shall include: identification of exceedance(s), duration of exceedance(s), reason for the exceedance(s), corrective actions taken, and action plan to prevent future exceedance(s).
	3. The Permittee shall provide a copy to MassDEP of any record required to be maintained by this Plan Approval within 30 days from MassDEP request.
	4. The Permittee shall submit to MassDEP for approval a stack emission pretest protocol, at least 30 days prior to emission testing, for any emission testing as defined in Table 3 Monitoring and Testing Requirements.
	5. The Permittee shall submit to MassDEP a final stack emission test results report, within 45 days after emission testing, for any emission testing as defined in Table 3 Monitoring and Testing Requirements.

**Table 5 Key:**

EU# = Emission Unit Number  
CMR = Code of Massachusetts Regulations  
MassDEP = Massachusetts Department of Environmental Protection  
BAW = Bureau of Air and Waste

#### 4. SPECIAL TERMS AND CONDITIONS

The Permittee is subject to, and shall comply with, the following special terms and conditions:

- A. The Permittee shall comply with the Special Terms and Conditions as contained in Table 6 below:

Table 6	
EU#	Special Terms and Conditions
EU1	1. The Permittee shall follow the Standard Operating and Maintenance Procedures for EU1 so as to maintain efficient operation and minimize emissions of VOC and HAP.
	2. The Permittee shall ensure that the maximum VOC content of each coating shall be less than 65 percent by weight.
	3. The Permittee shall ensure that the maximum vapor pressure of cleaning solvent shall be less than 1.0 mm of Hg at 20 °C.
Facility-wide	4. All VOC containing raw material, waste, and cleaning rags used in conjunction with cleaning operations shall be placed in tightly covered containers when not in use, and shall be collected for proper recycling or disposal.
	5. All VOC containing material shall be transported and stored in tightly covered containers. All emissions associated with cleaning operations shall be included in the monthly and 12 month rolling emissions calculations to determine the Permittee's compliance status with emission limits contained in Table 2 above.
	6. The Permittee shall label EU1 approved herein for proper monitoring, recordkeeping, and reporting purposes.

**Table 6 Key:**

EU# = Emission Unit Number  
VOC = Volatile Organic Compounds  
HAP = Hazardous Air Pollutants  
mm of Hg = millimeter of mercury  
°C = degrees Celsius.

- B. The Permittee shall utilize an exhaust stack, as required in Table 7, on EU1 that is consistent with good air pollution control engineering practice and that discharges so as to not cause or contribute to a condition of air pollution. Exhaust stack shall be configured to discharge the gases vertically and shall not be equipped with any part or device that restricts the vertical exhaust flow of the emitted gases, including but not limited to rain protection devices known as “shanty caps” and “egg beaters.” The Permittee shall install and utilize exhaust stack with the following parameters, as contained in Table 7 below, for the Emission Unit that are regulated by this Plan Approval:

<b>Table 7</b>					
<b>EU#</b>	<b>Stack Height Above Ground (feet)</b>	<b>Stack Height Above Roof (feet)</b>	<b>Stack Inside Exit Dimensions <i>in feet</i></b>	<b>Stack Gas Exit Velocity Range (feet per second)</b>	<b>Stack Gas Exit Temperature Range (°F)</b>
EU1	NA	10 General Ventilation	NA	NA	NA
Facility-wide					

**Table 7 Key:**

EU# = Emission Unit Number

°F = Degree Fahrenheit

NA = Not applicable

## 5. GENERAL CONDITIONS

The Permittee is subject to, and shall comply with, the following general conditions:

- A. Pursuant to 310 CMR 7.01, 7.02, 7.09 and 7.10, should any nuisance condition(s), including but not limited to smoke, dust, odor or noise, occur as the result of the operation of the Facility, then the Permittee shall immediately take appropriate steps including shutdown, if necessary, to abate said nuisance condition(s).
- B. If asbestos remediation/removal will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that all removal/remediation of asbestos shall be done in accordance with 310 CMR 7.15 in its entirety and 310 CMR 4.00.
- C. If construction or demolition of an industrial, commercial or institutional building will occur as a result of the approved construction, reconstruction, or alteration of this Facility, the Permittee shall ensure that said construction or demolition shall be done in accordance with 310 CMR 7.09(2) and 310 CMR 4.00.



- D. Pursuant to 310 CMR 7.01(2)(b) and 7.02(7)(b), the Permittee shall allow MassDEP and/or USEPA personnel access to the Facility, buildings, and all pertinent records for the purpose of making inspections and surveys, collecting samples, obtaining data, and reviewing records.
- E. This Plan Approval does not negate the responsibility of the Permittee to comply with any other applicable Federal, State, or local regulations now or in the future.
- F. Should there be any differences between the Application and this Plan Approval, the Plan Approval shall govern.
- G. Pursuant to 310 CMR 7.02(3)(k), MassDEP may revoke this Plan Approval if the construction work is not commenced within two years from the date of issuance of this Plan Approval, or if the construction work is suspended for one year or more.
- H. This Plan Approval may be suspended, modified, or revoked by MassDEP if MassDEP determines that any condition or part of this Plan Approval is being violated.
- I. This Plan Approval may be modified or amended when in the opinion of MassDEP such is necessary or appropriate to clarify the Plan Approval conditions or after consideration of a written request by the Permittee to amend the Plan Approval conditions.
- J. Pursuant to 310 CMR 7.01(3) and 7.02(3)(f), the Permittee shall comply with all conditions contained in this Plan Approval. Should there be any differences between provisions contained in the General Conditions and provisions contained elsewhere in the Plan Approval, the latter shall govern.

## **6. MASSACHUSETTS ENVIRONMENTAL POLICY ACT**

MassDEP has determined that the filing of an Environmental Notification Form (ENF) with the Secretary of Energy & Environmental Affairs, for air quality control purposes, was not required prior to this action by MassDEP. Notwithstanding this determination, the Massachusetts Environmental Policy Act (MEPA) and 301 CMR 11.00, Section 11.04, provide certain “Fail-Safe Provisions,” which allow the Secretary to require the filing of an ENF and/or an Environmental Impact Report (EIR) at a later time.

## **7. APPEAL PROCESS**

This Plan Approval is an action of MassDEP. If you are aggrieved by this action, you may request an adjudicatory hearing. A request for a hearing must be made in writing and postmarked within twenty-one (21) days of the date of issuance of this Plan Approval.

Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought. Additionally, the request must state why the Plan Approval is not consistent with applicable laws and regulations.

The hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars (\$100.00) must be mailed to:

Commonwealth of Massachusetts  
Department of Environmental Protection  
P.O. Box 4062  
Boston, MA 02211

This request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority.

MassDEP may waive the adjudicatory hearing-filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

Should you have any questions concerning this Plan Approval, please contact Mr. Dhiraj Desai by telephone at 978-694-3282, or in writing at the letterhead address

Sincerely,

This final document copy is being provided to you electronically by the  
Department of Environmental Protection. A signed copy of this document  
is on file at the DEP office listed on the letterhead.

Dhiraj B. Desai  
Environmental Engineer

This final document copy is being provided to you electronically by the  
Department of Environmental Protection. A signed copy of this document  
is on file at the DEP office listed on the letterhead.

Susan P. Ruch  
Acting Permit Chief and Deputy  
Regional Director  
Bureau of Air and Waste

ecc: Board of Health, 11 School Street, Amesbury, MA 01913  
Fire Department, 17 School Street, Amesbury, MA 01913

E-Copy:  
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MassDEP/NERO - M. Persky, M. Bolis